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RESEARCH IN MOTION LIMITED

10 UNITED STATES DISTRICT COURT

11 NORTHERN DISTRICT OF CALIFORNIA

12 SAN FRANCISCO DIVISION

14 RESEARCH IN MOTION LIMITED,

15 Plaintiff,

16 v.

17 VISTO CORPORATION,

18 Defendant.

21 AND RELATED COUNTERCLAIMS

Case No. C-07-3177 (MMC)

**DECLARATION OF SEAN O.
CHRISTOFFERSON IN SUPPORT OF
RESEARCH IN MOTION LIMITED'S
OPENING CLAIM CONSTRUCTION
BRIEF**

Date: June 16, 2008

Time: 9:00 a.m.

Before: Hon. Maxine M. Chesney

1 I, Sean O. Christofferson, declare:

2 1. I am an associate with Kirkland & Ellis LLP, the law firm representing Research In
3 Motion Limited (“RIM”) in the above-captioned matter. This declaration is based on my personal
4 knowledge, and I would testify to the matters set forth in this declaration if called upon as a witness.

5 2. Attached hereto as **Exhibit A** is a true and correct copy of a data sheet for the Visto
6 Mobile Enterprise Edition obtained from <http://www.visto.com/products/vmee.asp> on April 15,
7 2008.

8 3. Attached hereto as **Exhibit B** is a true and correct copy of a document titled “VMES
9 Security White Paper – Visto Mobile Enterprise Server 5.2” obtained from [http://www.vodafone.ie/](http://www.vodafone.ie/business/maillonthemove/busmail/VMES_52_Security_White_Paper_R2_A4.pdf)
10 [business/maillonthemove/busmail/VMES_52_Security_White_Paper_R2_A4.pdf](http://www.vodafone.ie/business/maillonthemove/busmail/VMES_52_Security_White_Paper_R2_A4.pdf).

11 4. Attached hereto as **Exhibit C** is a true and correct copy of an Amendment dated July 28,
12 1998 from the prosecution history of United States Patent No. 5,889,839.

13 5. Attached hereto as **Exhibit D** is true and correct copy of an excerpt from the McGraw-
14 Hill Dictionary of Scientific and Technical Terms (5th ed. 1994) defining the term “mailbox.”

15 6. Attached hereto as **Exhibit E** is a true and correct copy of an image taken from
16 http://www.visto.com/products/VMEE_diagram.asp on April 17, 2008. Exhibit E is incorporated on
17 page 5 of Visto Opening Claim Construction Brief.

18
19 I declare under penalty of perjury that the foregoing is true and correct. Executed this 17th
20 day of April 2008 in Los Angeles, California.

21 /s/ Sean O. Christofferson

22 Sean O. Christofferson
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CERTIFICATE OF SERVICE

I am employed in the County of Los Angeles, in the State of California. I am over the age of 18 and not a party to the within action. My business address is 777 South Figueroa Street, 37th Floor, Los Angeles, California 90017.

On April 17, 2008, I caused a copy of the following document(s) described as:

**DECLARATION OF SEAN O. CHRISTOFFERSON IN SUPPORT OF RESEARCH IN
MOTION LIMITED'S OPENING CLAIM CONSTRUCTION BRIEF**

to be served on the interested parties in this action as follows:

[X] [VIA ELECTRONIC MAIL] I caused said document[s] to be sent by electronic mail to the email address(es) indicated for the party(ies) listed below:

Robert D. Becker
E-mail: rbecker@manatt.com
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[X] [FEDERAL] I declare that I am employed in the office of a member of the bar of this court at whose direction this service was made.

Executed April 17, 2008, at Los Angeles, California.

/s/ Philip T. Chen

Philip T. Chen